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SEP 22 2016

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI **IN THE UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION**

**WILLIE STEVENSON, JR.**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 3:16cv214-NBB-DAS**

**BILL RASCO, Sheriff of Desoto County  
Mississippi; DESOTO COUNTY SHERIFF'S  
DEPARTMENT; LEE CALDWELL, Member of  
Desoto County, Mississippi, Board of Supervisors;  
MARK GARDNER, Member of Desoto County,  
Mississippi, Board of Supervisors; JESSIE MEDLIN,  
Member of Desoto County, Mississippi, Board of  
Supervisors; BILL RUSSELL, Member of Desoto  
County, Mississippi, Board of Supervisors;**

**DEFENDANTS**

**COMPLAINT FOR INJUNCTIVE RELIEF,  
DECLARATORY JUDGMENT AND DAMAGES  
JURY TRIAL DEMANDED**

**JURY TRIAL DEMANDED**

COMES NOW the Plaintiff, **WILLIE STEVENSON, JR.**, by and through himself, and files this Complaint against the Defendants, Desoto County Sheriff's Department, Bill Rasco, Sheriff, and the Desoto County, Mississippi Board of Supervisors.

**PARTIES AND JURISDICTION**

1.

Plaintiff **WILLIE STEVENSON, JR** is an adult resident of the State of Mississippi, where he now resides at the Bolivar County, Mississippi Correctional Facility, Cleveland, Mississippi, as an inmate.

2.

Defendants DeSoto County Sheriff Department, Sheriff Bill Rasco and the Desoto County, Mississippi Board of Supervisors are situated in DeSoto County, Mississippi, with a legal responsibility and duty to operate and administer a safe and secure jail under humane and safe conditions and within the rights and requirements of those which are incarcerated at such facility.

3.

Defendant Bill Rasco is employed as the elected Sheriff of DeSoto County Sheriff, Mississippi. As Sheriff, defendant Rasco has a duty and responsibility to manage and supervise all line employees working within the Desoto County Sheriff's Department. As well as to maintain adequate jail procedures and policies to prevent the injury and mistreatment of prisoners in the custody of the Desoto County Sheriff's Department. Defendant Rasco is the Chief Law Enforcement Officer of Desoto County, Mississippi. Defendant Rasco is charged by law with a legal responsibility and duty to serve and protect citizens and individuals within the borders of DeSoto County, Mississippi, and may be served with process at 311 West South Street, Hernando, Mississippi 38632.

4.

Defendant Lee Caldwell is an elected Supervisor of the Desoto County, Mississippi, Board of Supervisors. As a Supervisor defendant Caldwell is required to conduct inspections and review reports and procedures of the Desoto County Jail to insure that the facility is operated in compliance with law and that all jail procedures are adhered to by the Desoto County, Mississippi, Sheriff. Defendant Caldwell is being sued in his individual and/or official capacity at 365 Losher Street, Hernando, Mississippi 38632.

5.

Defendant, Mark Gardner, is an elected Supervisor of the Desoto County, Mississippi, Board of Supervisors. As a Supervisor defendant Gardner s required to conduct inspections and review reports and procedures of the Desoto County Jail to insure that the facility is operated in compliance with law and that all jail procedures are adhered to by the Desoto County, Mississippi, Sheriff. Defendant Gardner is being sued in his individual and/or official capacity at 365 Losher Street, Hernando, Mississippi 38632.

6.

Defendant, Jessie Medlin, is an elected Supervisor of the Desoto County, Mississippi, Board of Supervisors. As a Supervisor defendant Medlin is required to conduct inspections and review reports and procedures of the Desoto County Jail to insure that the facility is operated in compliance with law and that all jail procedures are adhered to by the Desoto County, Mississippi, Sheriff. Defendant Medlin is being sued in his individual and/or official capacity at 365 Losher Street, Hernando, Mississippi 38632.

7.

Defendant, Bill Russell, is an elected Supervisor of the Desoto County, Mississippi, Board of Supervisors. As a Supervisor defendant Russell s required to conduct inspections and review reports and procedures of the Desoto County Jail to insure that the facility is operated in compliance with law and that all jail procedures are adhered to by the Desoto County, Mississippi, Sheriff. Defendant Russell is being sued in his individual and/or official capacity at 365 Losher Street, Hernando, Mississippi 38632.

8.

This Court has subject matter jurisdiction over this civil action and has personal

jurisdiction over the parties. Venue is proper in this Court..

**FACTS**

9.

On February 25, 2014, while in the custody of the Desoto County Sheriff's department and confined to the Desoto County Jail, plaintiff was injured by suffering a broken arm at the jail by inadequate jail conditions and negligence of jail staff at the Desoto County Jail.

10.

That plaintiff was subsequently treated at Baptist Memorial Hospital - Desoto by Dr. David Allen Hooker who performed medical surgery by setting plaintiff's broken arm. Plaintiff was treated and released back into the custody of the Desoto County Sheriff's Department.

**CLAIMS**

11.

The actions of the defendants subjected plaintiff to a violation of his constitutional right under the First, Fifth, and Fourteenth Amendments to the United States Constitution where plaintiff was subjected to inadequate jail conditions and negligent treatment on the part of jail staff while in lawful custody of the Desoto County Sheriff's department which caused plaintiff irreparable injury which he will not recover from because of sustaining a broken arm. Defendants violated plaintiff's civil rights in regards to such actions.

**DAMAGES**

12.

Plaintiff's adopts and incorporate herein by reference the allegations made in

paragraphs 1 through 11 above.

13.

As a direct and proximate result of the combined acts of being subjected to inadequate and unconstitutional jail conditions, negligence, and concurrent gross wrongful and physically abusive, willful, wanton, reckless, and malicious acts or omissions because of the actions of the defendants. Plaintiff is entitled to an award of actual damages of:

- A. Seven million dollars (7,000,000.00) for physical injury and suffering which resulted from the acts of the Defendants while serving in their official offices as elected officials of Desoto County, Mississippi.

**PUNITIVE DAMAGES**

14.

As a result of Defendants unconstitutional, negligent, and illegal and malicious actions, the Plaintiff Willie Stevenson sustained substantial physical damages and underwent pain and suffering to necessitate an award of one million dollars (\$1,000,000.00) punitive damages from the defendants.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs, Willie Stevenson demands a trial by jury on all issues triable by jury, and a judgment, consisting of actual monetary damages in the amount of seven million dollars (\$7,000,000.00) actual damages and punitive damages in the amount of \$1,000,000.00 consistent with Mississippi law, against the Defendants together with interest, costs, and any general relief otherwise warranted.

This 16 day of March, 2016.

Respectfully submitted,

BY:

Willie Stevenson Jr.  
Willie Stevenson, Jr., #188860  
2792 Hwy 8 West  
Cleveland, MS 38732

STATE OF MISSISSIPPI )  
 ) SS:  
COUNTY OF BOLIVAR )

O A T H

PERSONALLY APPEARED BEFORE ME, the undersigned authority, a notary public, in and for the jurisdiction aforesaid, the within named, Willie Stevenson, Jr., who, after first being duly sworn on her oath, depose and sayeth:

1). I, Willie Stevenson, Jr., do solemnly swear and affirm that I am a citizen of the State of Mississippi, and do hereby state that the information contained in the foregoing complaint is true and correct. I state these facts under the penalty of perjury.

2). I bring this action in good faith and I believe that my claims are meritorious and I am entitled to the relief which I seek by same.

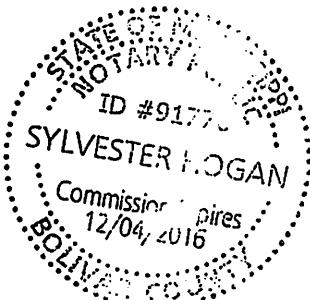
Willie Stevenson Jr.  
Willie Stevenson, Jr., Affiant

SWORN AND SUBSCRIBED BEFORE ME, this 16 DAY of March, 2016.

12-4-16

MY COMMISSION EXPIRES

Sylvester Hogan  
NOTARY PUBLIC





Willie Stevenson, Jr., #188860  
Zone 5, Bed 22  
2792 Hwy 8 West  
Cleveland, MS 38732

United States District Court Clerk  
911 Jackson Avenue, Room 369  
Oxford, MS 38655